

December 30, 2021

Via ECF

Judge Pamela K. Chen
Magistrate Judge Robert M. Levy
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Kurtz v. Kimberly-Clark Corp., et al.*, 1:14-cv-01142-PKC-RML and *Honigman v. Kimberly-Clark Corp.*, 2:15-cv-02910-PKC-RML; Notice of Class Settlement
in Principle and Joint Motion to Stay

Dear Judges Chen and Levy:

We write on behalf of defendant Kimberly-Clark Corp. (“Kimberly-Clark”) and plaintiffs Honigman and Kurtz (“Plaintiffs”) in the above-captioned actions to inform the Court that Plaintiffs and Kimberly-Clark have reached an agreement in principle to a nationwide class settlement as to Plaintiffs’ claims against Kimberly-Clark.

Plaintiffs and Kimberly-Clark therefore jointly move this Court to stay all case deadlines in the above-captioned actions as they pertain to Kimberly-Clark,¹ except for any forthcoming settlement-related deadlines and proceedings (e.g., motions for preliminary and final approval), which are contingent upon the parties executing a formal settlement agreement. The parties intend to work expeditiously to execute the settlement agreement and move for preliminary approval.

Respectfully submitted,

/s/ Eamon P. Joyce

Eamon P. Joyce
Counsel for Kimberly-Clark Corp.

/s/ Vincent M. Serra

Vincent M. Serra
Counsel for Plaintiffs Kurtz and Honigman

cc: Counsel of Record via ECF

¹ The operative discovery and dispositive motions deadlines are docketed at *Kurtz* Dkt. No. 420-1.